

From: [McKenna, Jim](#)
To: [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [Jennifer Woronets](#); [Wyatt, Robert](#); [RICKA@BES.CI.PORTLAND.OR.US](#); [frederick.wolf@total.com](#); [Ashton, David](#)
Subject: COCs for initiating the FS Process
Date: 04/22/2010 02:38 PM

Chip and Eric:

The LWG is providing the following response to EPA's letter of April 9, 2010, specific to the comment about the use of the term COCs for chemicals that will be used to initiate the FS process:

The LWG disagrees that all of the chemicals currently being evaluated in the FS are COCs, primarily because final risk assessments are not available, and therefore final COCs have not been identified. The guidance that EPA quotes in both cases explicitly assumes that a final determination supported by a final risk assessment has taken place. However, for the purposes of facilitating the FS process, the LWG agrees to use these chemicals, and the term "COCs" for this interim stage of the FS. Until the risk assessments have been finalized, communications and documents regarding the FS process and interim results will discuss the status of these chemicals in the risk assessment finalization process. The draft FS will also explicitly recognize that once the risk assessments are finalized the COCs from that final document will be used in the final FS. The final COCs will be defined in a manner that is consistent with the risk assessment endpoints. That will include weighing multiple lines of evidence, addressing uncertainties about chemical exposure and toxicity, and inferring risks to population and community level assessment endpoints from organisms-level measurement endpoints.

If you have any questions please feel free to call me.

Thanks, Jim.